

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY

CORPORATION, as assignee of individuals
who are Covered Persons, JANE DOE-1, a
law enforcement officer, JANE DOE-2, a
law enforcement officer, PATRICK
COLLIGAN and PETER ANDREYEV

Plaintiffs,

v.

PEOPLEWHIZ, INC., RICHARD ROES 1-
10, fictitious names of unknown individuals
and ABC COMPANIES 1-10, fictitious
names of unknown entities,

Defendants.

Civ. No. 1:25-cv-00237-HB

**DEFENDANT PEOPLEWHIZ, INC.’S
JOINDER TO MOTION TO DISMISS
PLAINTIFFS’ COMPLAINT
PURSUANT TO FED. R. CIV. P.
12(b)(6)**

JOINDER TO MOTION TO DISMISS PLAINTIFFS’ COMPLAINT

PLEASE TAKE NOTICE that on March 18, 2025, Defendant PeopleWhiz, Inc.

(“PeopleWhiz”) hereby joins in motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(6) filed by the defendants in the related action: Atlas Data Privacy Corp., et al. v. DM Group Inc., et al., No. 24-cv 04075-HB. PeopleWhiz’s joinder in the defendants’ Rule 12(b)(6) motion to dismiss is done in the alternative to the concurrently filed consolidated motion to dismiss for lack of personal jurisdiction by Defendants in the related cases, under which PeopleWhiz is a movant.

In support of this Motion to Dismiss, PeopleWhiz relies on, and adopts as if set forth herein, the briefing in support of the defendants’ Fed. R. Civ. P. 12(b)(6) motions to dismiss filed in the related actions.

Dated: March 18, 2025

Respectfully submitted,

/s/ John E. Brigandi
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